

From: [Pallesen, Reginald](#)
To: [Bardo, Kenneth](#); [Moore, Tammy](#)
Cc: [Murawski, Richard](#)
Subject: RE: Solutia Letter regarding the Judith Lane Containment Cell
Date: Monday, April 15, 2013 12:12:15 PM

OK. US EPA also has to do a TSCA PCB approval which could include ownership and title provisions, I suppose.

From: Bardo, Kenneth
Sent: Monday, April 15, 2013 12:05 PM
To: Pallesen, Reginald; Moore, Tammy
Cc: Murawski, Richard
Subject: RE: Solutia Letter regarding the Judith Lane Containment Cell

If Solutia does not get the RAPP, the JLCC would remain in CERCLA so I don't think they would want to change operator/ownership of the JLCC until the RAPP was assured. There could be a window of time where they might demonstrate ownership before IEPA has final issuance of the RAPP. Maybe IEPA could require this in any draft approval.

From: Pallesen, Reginald
Sent: Monday, April 15, 2013 10:14 AM
To: Bardo, Kenneth; Moore, Tammy
Cc: Murawski, Richard
Subject: RE: Solutia Letter regarding the Judith Lane Containment Cell

The Solutia letter states, "Furthermore, if an acceptable RAPP is issued, Solutia acknowledges that it will be the owner and operator of the JLCC... ."

Is Solutia going to take title to the JLCC? When? Shouldn't Solutia be the owner before the RAPP is issued?